

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Response Deadline: April 10, 2025 at 4:00 p.m. (ET)

**THE FTX RECOVERY TRUST’S FIRST NOTICE OF
SATISFACTION OF CLAIMS SATISFIED IN FULL**

YOUR RIGHTS MAY BE AFFECTED BY A FAILURE TO RESPOND TO THIS NOTICE BY THE DEADLINE SET FORTH HEREIN. CLAIMANTS RECEIVING THIS NOTICE SHOULD LOCATE THEIR NAMES AND SATISFIED CLAIMS ON EXHIBIT 1 ATTACHED HERETO AND, IF APPLICABLE, FILE A RESPONSE BY THE RESPONSE DEADLINE FOLLOWING THE INSTRUCTIONS SET FORTH HEREIN. THIS NOTICE IS WITHOUT PREJUDICE TO THE FTX RECOVERY TRUST’S RIGHTS TO PURSUE FURTHER SUBSTANTIVE OR NON-SUBSTANTIVE OBJECTIONS AGAINST ANY AND ALL CLAIMS, INCLUDING THE SATISFIED CLAIMS LISTED ON EXHIBIT 1 HERETO.

The FTX Recovery Trust² hereby files this notice (this “Notice”) identifying certain amounts scheduled (the “Satisfied Scheduled Claims”) by the above-captioned debtors (the “Debtors”) and certain claims, as defined by section 101(5) of chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”), filed by claimants in the above-captioned Chapter 11 cases (the “Satisfied Proofs of Claim” and together with the Satisfied Scheduled Claims, the “Satisfied Claims”), which have been fully satisfied as set forth on Exhibit 1 attached hereto. In support of

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

² The FTX Recovery Trust (a/k/a the Consolidated Wind Down Trust) was established on January 3, 2025, the effective date of the Debtors’ confirmed *Second Amended Joint Chapter 11 Plan of Reorganization of FTX Trading Ltd. and its Debtor Affiliates* [D.I. 26404-1].

this Notice, the FTX Recovery Trust respectfully represents as follows:

BACKGROUND

1. On November 11 and November 14, 2022 (as applicable, the “Petition Date”), the Debtors filed with the United States Bankruptcy Court for the District of Delaware voluntary petitions for relief under the Bankruptcy Code (the “Chapter 11 Cases”). On December 15, 2022, the Office of the United States Trustee for the District of Delaware (the “U.S. Trustee”) appointed an Official Committee of Unsecured Creditors (the “Committee”) pursuant to section 1102 of the Bankruptcy Code [D.I. 231].

2. Additional factual background relating to the Debtors’ businesses and the commencement of these Chapter 11 Cases is set forth in the *Declaration of John J. Ray III in Support of Chapter 11 Petitions and First Day Pleadings* [D.I. 24], the *Declaration of Edgar W. Mosley II in Support of Chapter 11 Petitions and First Day Pleadings* [D.I. 57], the *Supplemental Declaration of John J. Ray III in Support of First Day Pleadings* [D.I. 92] and the *Supplemental Declaration of Edgar W. Mosley II in Support of First Day Pleadings* [D.I. 93].

3. On October 7, 2024, the Court confirmed the *Second Amended Joint Chapter 11 Plan of Reorganization of FTX Trading Ltd. and Its Debtor Affiliates* [D.I. 26404-1] (the “Plan”), and on October 8, 2024, entered the *Findings of Fact, Conclusions of Law and Order Confirming the Second Amended Joint Chapter 11 Plan of Reorganization of FTX Trading Ltd. and Its Debtor Affiliates* [D.I. 26404].

4. On January 3, 2025, the effective date of the Plan occurred (the “Effective Date”), which, among other things, established the FTX Recovery Trust and transferred, assigned, and vested all of the Debtors’ assets in the FTX Recovery Trust. *See Notice of Effective Date of*

the Second Amended Joint Chapter 11 Plan of Reorganization of FTX Trading Ltd. and Its Debtor Affiliates [D.I. 29127].

CLAIMS PROCESS

5. On March 14, March 15 and March 27, 2023, the Debtors filed Schedules of Assets and Liabilities (as amended or supplemented from time-to-time, the “Schedules”), Statements of Financial Affairs (as amended or supplemented from time-to-time, the “Statements”) and their accompanying Global Notes (as amended or supplemented from time-to-time, the “Global Notes” and together with the Schedules and Statements, the “Schedules & Statements”) with the Court [D.I. 865-1083, D.I. 1166].

6. On June 28, 2023, the Court entered the *Order (I)(A) Establishing Deadlines for Filing Customer Proofs of Claim, (B) Approving Procedures for Submitting Proofs of Claim and (C) Approving the Form and Manner of Notice Thereof and (II) Granting Related Relief* [D.I. 1793] (the “Customer Bar Date Order”). The Customer Bar Date Order established, among other things, the deadline of September 29, 2023 to file Customer Claims³ against the Debtors. Notice of the Bar Date was provided by mail and publication in accordance with the procedures outlined in the Bar Date Order.

7. To date, approximately 95,900 customer proofs of claim have been filed against the Debtors and the FTX Recovery Trust, asserting more than \$52,024,000,000.⁴

CLAIMS SATISFIED AFTER THE PETITION DATE

8. The FTX Recovery Trust, with the assistance of its advisors, has been reviewing and reconciling Proofs of Claim, including any supporting documentation attached

³ Capitalized terms not defined herein shall have the meanings ascribed to them in the Customer Bar Date Order or the Plan, as applicable.

⁴ Excludes over 499 frivolous customer claims filed in aggregate for more than \$1.187 sextillion.

thereto, and reconciling the Proofs of Claim and the status of scheduled claims with the Debtors' Schedules and books and records to determine the validity and/or status of the asserted and scheduled claims. While this analysis and reconciliation is ongoing, the FTX Recovery Trust has determined that the Satisfied Claims identified on **Exhibit 1** have been satisfied, in full, after the Petition Date, and that no further distributions are required on account of such satisfied amounts. Specifically, each of the Satisfied Claims listed on **Exhibit 1** are on account of customer claims that were fully paid by non-Debtors FTX Australia Pty Ltd. and FTX Express Pty Ltd. in their separate Australian proceedings.⁵

9. Accordingly, the FTX Recovery Trust intends to have its claims and noticing agent, Kroll, designate on the official register of claims maintained in these Chapter 11 Cases (the "**Claims Register**") that the Satisfied Claims have been satisfied in full as set forth herein and on **Exhibit 1**. Out of an abundance of caution, the FTX Recovery Trust is serving this Notice on all holders of the Satisfied Claims to provide such parties with an opportunity to dispute the FTX Recovery Trust's position that such amounts have been satisfied in full.

RESPONSES TO THIS NOTICE

10. By this Notice, the FTX Recovery Trust requests that any holder of a Satisfied Scheduled Claim or Satisfied Proof of a Claim (a "**Claimant**"), who disputes the FTX Recovery Trust's determination that its Satisfied Claim has been satisfied in full as provided for on **Exhibit 1**, file and serve a written response to this Notice (a "**Response**") so that it is received no later than **April 10, 2025 at 4:00 p.m. (ET)** (the "**Response Deadline**"). Each Response to this Notice must be filed with the Office of the Clerk of the United States Bankruptcy Court for the

⁵ See Plan § 7.12 (establishing anti-double dip procedures and authorizing the Plan Administrator to adjust the amount of claims for which the holder has already been compensated in any proceedings with respect to FTX Australia).

District of Delaware: 824 Market Street, 3rd Floor, Wilmington, Delaware 19801, and served upon counsel to the FTX Recovery Trust, (a) Sullivan & Cromwell LLP, 125 Broad Street, New York, New York 10004, Attn: Christian P. Jensen (jensenc@sullcrom.com) and David M. Rosenthal (rosenthald@sullcrom.com) and (b) Landis Rath & Cobb LLP, 919 Market Street, Suite 1800, Wilmington, Delaware 19801, Attn: Kimberly A. Brown (brown@lrclaw.com) and Matthew R. Pierce (pierce@lrclaw.com), so as to be actually received by no later than the Response Deadline.

11. Each Response to this Notice must, at a minimum, contain the following information:

- a. a caption setting forth the name of the Court, the name of the Debtors, the lead case number and the title of the Notice to which the Response is directed;
- b. the name of the Claimant, the claim or schedule number, and a description of the basis for the amount of the claim;
- c. the specific factual basis and supporting legal argument upon which the Claimant will rely in opposing this Notice;
- d. all documentation and other evidence upon which the Claimant will rely to support the basis for opposing this Notice; and
- e. the name, address, telephone number, fax number and/or email address of the person(s) (which may be the Claimant or the Claimant's legal representative) with whom counsel for the FTX Recovery Trust should communicate with respect to the Satisfied Claim or the Notice and who possesses authority to reconcile, settle, or otherwise resolve the response to this Notice on behalf of the Claimant.

12. If a Response is properly and timely filed and served in accordance with the above procedures, the FTX Recovery Trust will determine whether there is a basis upon which to sustain the Claimant's assertion that its Satisfied Claim has not in fact been satisfied in full. In the event the parties are unable to reach a resolution, the FTX Recovery Trust may schedule a hearing on the Satisfied Claim. The Debtors reserve the right to contest any new assertions of liability

against the Debtors and/or the FTX Recovery Trust made by Claimants with respect to their Satisfied Claim(s).

13. If the Claimant fails to file and serve a timely Response by the Response Deadline in accordance with the procedures set forth herein, then (i) such Claimant is deemed to have consented to this Notice and the FTX Recovery Trust's determination with respect to its Satisfied Claim, as set forth herein and on **Exhibit 1**, and (ii) without further notice to any party (including the Claimant) or order of the Bankruptcy Court, Kroll shall update the Claims Register to reflect such Satisfied Claim as satisfied in full.

RESERVATION OF RIGHTS

14. The FTX Recovery Trust reserves any and all rights to amend, supplement, or otherwise modify this Notice and the list of Satisfied Claims identified on **Exhibit 1** attached hereto and to file additional notices of this nature with respect to any and all (i) claims filed in these Chapter 11 Cases and (ii) amounts scheduled against the Debtors' estates in the Schedules & Statements. The FTX Recovery Trust also reserves the right to file objections to any other claims (filed in these Chapter 11 Cases or not) that may be asserted against the Debtors, their estates or the FTX Recovery Trust. The FTX Recovery Trust also reserves any and all rights, claims, and defenses with respect to any and all of the Satisfied Claims identified on **Exhibit 1**, and nothing included or omitted from this Notice shall impair, prejudice, or otherwise affect any such rights, claims, and defenses. Notwithstanding anything contained in this Notice or the exhibit attached hereto, nothing herein will be construed as a waiver of any rights that the FTX Recovery Trust may have to enforce rights of setoff against the Claimants.

Dated: March 5, 2025
Wilmington, Delaware

LANDIS RATH & COBB LLP

/s/ Matthew R. Pierce

Adam G. Landis (No. 3407)
Kimberly A. Brown (No. 5138)
Matthew R. Pierce (No. 5946)
919 Market Street, Suite 1800
Wilmington, Delaware 19801
Telephone: (302) 467-4400
Facsimile: (302) 467-4450
E-mail: landis@lrclaw.com
brown@lrclaw.com
pierce@lrclaw.com

-and-

SULLIVAN & CROMWELL LLP

Andrew G. Dietderich (admitted *pro hac vice*)
James L. Bromley (admitted *pro hac vice*)
Brian D. Glueckstein (admitted *pro hac vice*)
Christian P. Jensen (admitted *pro hac vice*)
125 Broad Street
New York, NY 10004
Telephone: (212) 558-4000
Facsimile: (212) 558-3588
E-mail: dietdericha@sullcrom.com
bromleyj@sullcrom.com
gluecksteinb@sullcrom.com
jensenc@sullcrom.com

Counsel to the FTX Recovery Trust